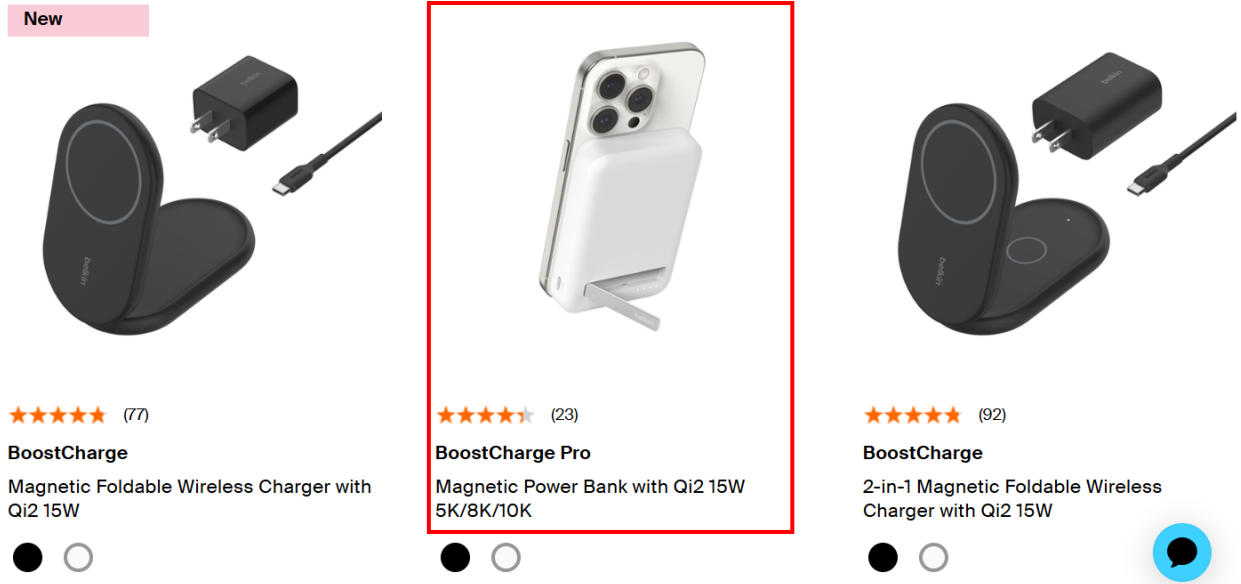


EXHIBIT B

U.S. Patent No. US 9,448,603 v. Belkin

1. Claim Chart

Claim	Analysis
<p>[1.P] A method for transferring power to a receptor mobile device from a donor mobile device having a battery, comprising;</p>	<p>Belkin (“Company”) performs and/or induces others to perform a method for transferring power to a receptor mobile device from a donor mobile device having a battery.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides wireless charging power banks such as BoostCharge and BoostCharge Pro (used herein as an exemplary infringing product). BoostCharge Pro magnetic power bank implements Qi2, a standard for wireless power transfer, and wirelessly transfers power from the magnetic power bank (“donor mobile device having a battery”) to Qi-2 enabled smartphones (“receptor mobile device”) including, but not limited to iPhone 12, iPhone 13, iPhone 14, iPhone 15, and iPhone 16.</p> <div data-bbox="415 792 1648 1372">  <p>The image shows three Belkin products: a BoostCharge Magnetic Foldable Wireless Charger (left), a BoostCharge Pro Magnetic Power Bank (center, highlighted with a red box), and a BoostCharge 2-in-1 Magnetic Foldable Wireless Charger (right). Each product is shown with its packaging, a power adapter, and a USB-C cable. The BoostCharge Pro is a white, rectangular power bank with a foldable stand. The BoostCharge and BoostCharge 2-in-1 are black, foldable wireless chargers. Below each product is a star rating and a count in parentheses: BoostCharge (77), BoostCharge Pro (23), and BoostCharge 2-in-1 (92). Below the ratings are two circles, one filled and one empty, representing a toggle switch. A blue speech bubble icon is located at the bottom right of the product images.</p> </div> <p>Source: https://www.belkin.com/products/wireless-chargers/wireless-charging-stands/</p>

BoostCharge Pro

Magnetic Power Bank with Qi2 15W 8K

SKU: BPD007btWH

★★★★☆ 4.4 (24)

Wirelessly charge iPhone and other Qi2-enabled smartphones quickly and safely with our BoostCharge Pro Magnetic Power Bank with Qi2 15W 8K[®]. Your Qi2 and MagSafe compatible devices will have easy and seamless on-the-go charging up to 15W. Watch video, stream or create content at the perfect viewing angle with the integrated kickstand – even while your device is charging.

Source: <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html>



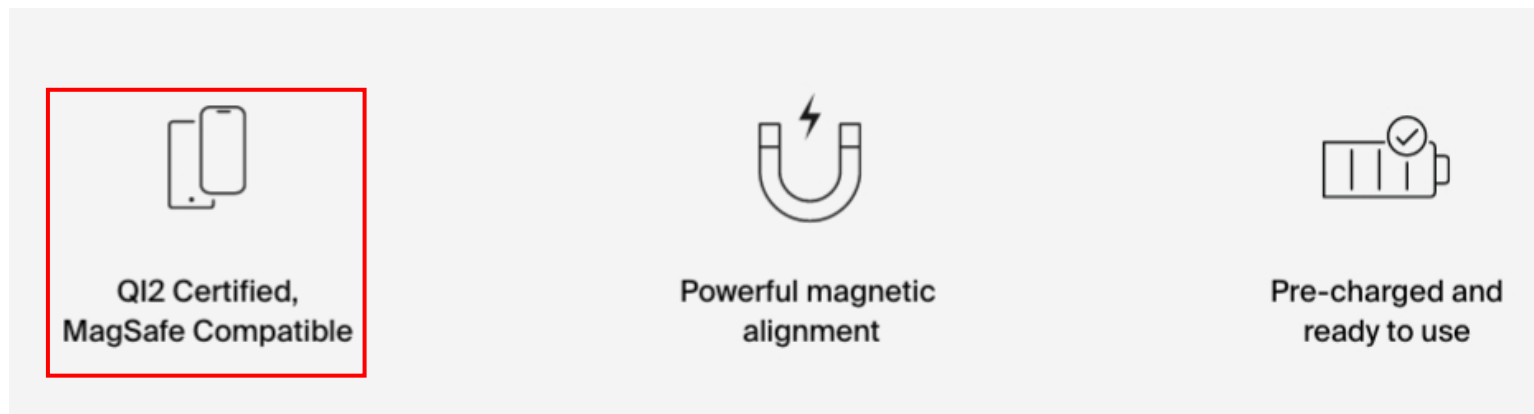
Source: <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html> (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

<p>[1.1] configuring a donor wireless power transfer mechanism on the donor mobile device using a wireless transmit application;</p>	<p>Company performs and/or induces others to perform a method of configuring a donor wireless power transfer mechanism on the donor mobile device using a wireless transmit application.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, BoostCharge Pro utilizes Qi2 wireless charging technology to wirelessly charge the compatible Qi-2 enabled smartphones such as iPhone 15. Therefore, upon information and belief, BoostCharge Pro comprises a firmware that configures the magnetic power bank for the wireless charging (“configuring a donor wireless power transfer mechanism on the donor mobile device using a wireless transmit application”).</p> <ul style="list-style-type: none"> • Up to 15W fast charging with Qi2 for compatible iPhone and other Qi2-enabled devices • Qi2 wireless charging technology features magnets for perfect alignment • Gain 28 hours additional battery life[†] • Compact and portable • Designed with your device’s camera in mind — doesn’t block view when attached • Integrated kickstand keeps your device upright while in use • Pass-through power allows power bank to be used as a standard wall charger • Charge multiple devices with USB-C port; USB-C to USB-C cable included to start charging right out of the box • Supports StandBy to style your iPhone as you’d like • Compatible with MagSafe and other cases up to 3mm • Overcharge protection for a safe and powerful charge • Post-consumer recycled plastic (excluding cable)* and 100% plastic-free packaging • 2-year warranty and CEW up to \$2500 for peace of mind** <p>Source: https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html</p>
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Source: <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html>



Source: <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

<p>[1.2] configuring a receptor wireless power transfer mechanism on the receptor mobile device using a wireless receive application;</p>	<p>Company performs and/or induces others to perform a method of configuring a receptor wireless power transfer mechanism on the receptor mobile device using a wireless receive application.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when the Qi-2 enabled smartphone is placed over the BoostCharge Pro stand, the smartphone sticks magnetically to the stand and gets charged by the magnetic power bank. Therefore, it would be apparent to a person having ordinary skill in the art that the smartphone comprises a wireless receive application in its firmware that is activated in order for the charging to commence (“configuring a receptor wireless power transfer mechanism on the receptor mobile device”).</p> <ul style="list-style-type: none"> • Up to 15W fast charging with Qi2 for compatible iPhone and other Qi2-enabled devices • Qi2 wireless charging technology features magnets for perfect alignment • Gain 28 hours additional battery life[†] • Compact and portable • Designed with your device’s camera in mind — doesn’t block view when attached • Integrated kickstand keeps your device upright while in use • Pass-through power allows power bank to be used as a standard wall charger • Charge multiple devices with USB-C port; USB-C to USB-C cable included to start charging right out of the box • Supports StandBy to style your iPhone as you’d like • Compatible with MagSafe and other cases up to 3mm • Overcharge protection for a safe and powerful charge • Post-consumer recycled plastic (excluding cable)* and 100% plastic-free packaging • 2-year warranty and CEW up to \$2500 for peace of mind** <p>Source: https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html</p>
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the receptor mobile device

BoostCharge Pro

Source: <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html> (annotated)

Magnetic Qi2 attachment.

Whether you're gaming, streaming or scrolling, our magnetic power bank holds your device securely.



Source: <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html>

	<div data-bbox="443 269 1184 636" data-label="Image"> </div> <p data-bbox="1402 370 1690 440">iPhone 15 placed over BoostCharge Pro</p> <p data-bbox="409 657 1780 691">Source: https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html (annotated)</p> <p data-bbox="409 732 1866 802">Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p data-bbox="199 846 388 1414">[1.3] transferring power from donor mobile device to the receptor mobile device using the donor wireless power transfer mechanism and the receptor wireless</p>	<p data-bbox="409 846 1934 948">Company performs and/or induces others to perform a method of transferring power from donor mobile device to the receptor mobile device using the donor wireless power transfer mechanism and the receptor wireless power transfer mechanism.</p> <p data-bbox="409 989 1543 1023">This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p data-bbox="409 1063 1934 1166">For example, the power is transferred from the BoostCharge Pro magnetic power bank to the Qi-2 enabled smartphone through Qi-2 wireless power transfer technology using magnetic induction ("the donor wireless power transfer mechanism and the receptor wireless power transfer mechanism").</p>

power transfer mechanism; and	<ul style="list-style-type: none"> • Up to 15W fast charging with Qi2 for compatible iPhone and other Qi2-enabled devices • Qi2 wireless charging technology features magnets for perfect alignment • Gain 28 hours additional battery life[†] • Compact and portable • Designed with your device's camera in mind — doesn't block view when attached • Integrated kickstand keeps your device upright while in use • Pass-through power allows power bank to be used as a standard wall charger • Charge multiple devices with USB-C port; USB-C to USB-C cable included to start charging right out of the box • Supports StandBy to style your iPhone as you'd like • Compatible with MagSafe and other cases up to 3mm • Overcharge protection for a safe and powerful charge • Post-consumer recycled plastic (excluding cable)* and 100% plastic-free packaging • 2-year warranty and CEW up to \$2500 for peace of mind** <p>Source: https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html</p> <p>Wireless charging of smartphones and other portable consumer devices has been transformed by Qi. Initially launched in 2010, there are over 9000 Qi Certified products in the market today, setting a new global benchmark for safety, efficiency and interoperability. Qi v2.0, the latest generation of the Qi standard, will take wireless charging to the next level and unify the concept under one global standard.</p> <p>Source: https://www.wirelesspowerconsortium.com/standards/qi-wireless-charging/</p>
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The Qi v2.0 standard will unify the wireless charging industry under one global standard, eliminating consumer confusion and enabling greater device interoperability. Foremost among the devices coming to market under the Qi v2.0 standard are those labeled Qi2. Qi2 devices feature Magnetic Power Profile technology which aligns devices and chargers perfectly for improved energy efficiency, faster charging, and easier usability. Qi2 products can be identified by a Qi2 logo on the device or packaging.

Source: <https://www.wirelesspowerconsortium.com/standards/qi-wireless-charging/>

Washington D.C., November 15, 2023 – The [Wireless Power Consortium's](#) (WPC) next generation standard for wireless charging, [Qi v2.0](#), will soon be delivering on its promise of magnetic attachment, faster charging, higher efficiency and greater convenience as the first Qi2 mobile devices complete certification testing. In addition to an enhanced user experience, Qi v2.0 unifies the industry under one global standard.

The first Qi v2.0 Certified products will be available in time for the holiday season starting with Apple's iPhone 15 lineup and a host of power transmitters. [Belkin](#), [Mophie](#), [Anker](#) and [Aircharge](#) have all pre-announced Qi2 products. Over 100 devices are currently in testing or in the certification testing queue.

The WPC introduced Qi2 (pronounced 'chee two') earlier this year at the Consumer Electronics Show in Las Vegas, where it was met with industry-wide praise including 'Best Mobile Tech' and 'Best in Show' awards from industry publications.

The Qi v2.0 standard consists of two profiles, the Magnetic Power Profile (MPP) which is based on MagSafe® technology contributed by Apple to WPC and branded with the Qi2 logo, and an enhancement to the existing wireless charging Extended Power Profile (EPP) that does not include magnets but complies with the Qi v2.0 standard. New Qi v2.0 EPP products will be branded with the existing Qi logo consumers know and use today.

Source: <https://www.wirelesspowerconsortium.com/media/w0ha5cbk/qi2-certification-rolls-out-news-release-11132023.pdf>, Page 1

transferring power from donor mobile device to the receptor mobile device

The Qi wireless power transfer system uses magnetic induction to transfer power from a Power Transmitter Product (charger) to a Power Receiver Product (smartphone).

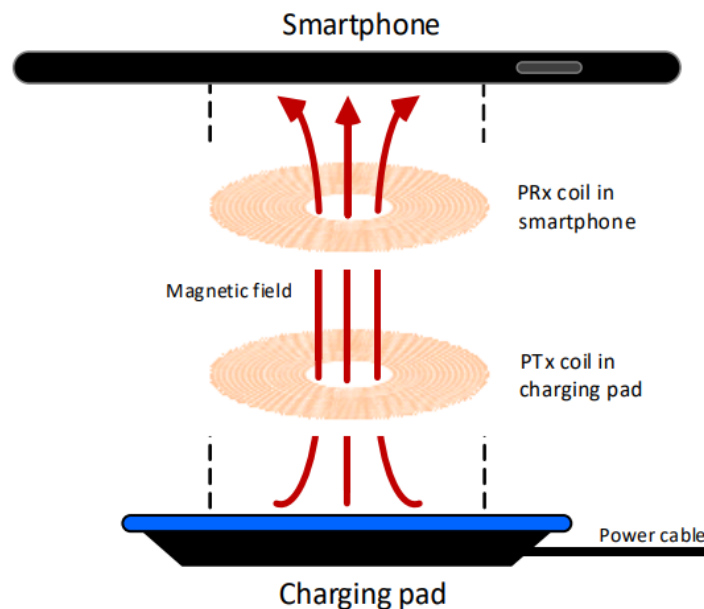
Source: <https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip> (Qi-v2.0-introduction.pdf, Page 4) (annotated)

	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.
[1.4] receiving and converting received power into electric current using the receptor wireless power transfer mechanism;	<p>Company performs and/or induces others to perform a method of receiving and converting received power into electric current using the receptor wireless power transfer mechanism.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, magnetic induction technology is used to transfer power from the power transmitter in the BoostCharge Pro stand to the power receiver in the Qi-2 enabled smartphones. Further, when charging begins, the magnetic field is picked up by the coil inside the Qi-2 enabled smartphones and transformed by a power converter back into a direct electrical current that can be used to charge the battery of the Qi-2 enabled smartphones.</p> <h3>3 How Qi wireless power transfer works</h3> <h4>3.1 Basic concepts</h4> <div style="border: 1px solid red; padding: 5px;"> <p>The Qi wireless power transfer system uses magnetic induction to transfer power from a Power Transmitter Product (charger) to a Power Receiver Product (smartphone).</p> </div> <p>Source: https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip (Qi-v2.0-introduction.pdf, Page 4)</p>

When charging begins, the Power Transmitter runs an alternating electrical current through its coil(s), which generates an alternating magnetic field in accordance with Faraday's law. This magnetic field is in turn picked up by the coil inside the Power Receiver and transformed by a power converter back into a direct electrical current that can be used to charge the battery.

A critical feature of the magnetic field is that it can transfer through any non-metallic, non-ferrous materials, such as plastics, glass, water, wood, and air. In other words, wires and connectors are not needed between the Power Transmitter Product and Power Receiver Product.

Figure 3. Qi wireless power transfer using magnetic induction



Source: <https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip> (Qi-v2.0-introduction.pdf, Page 2)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

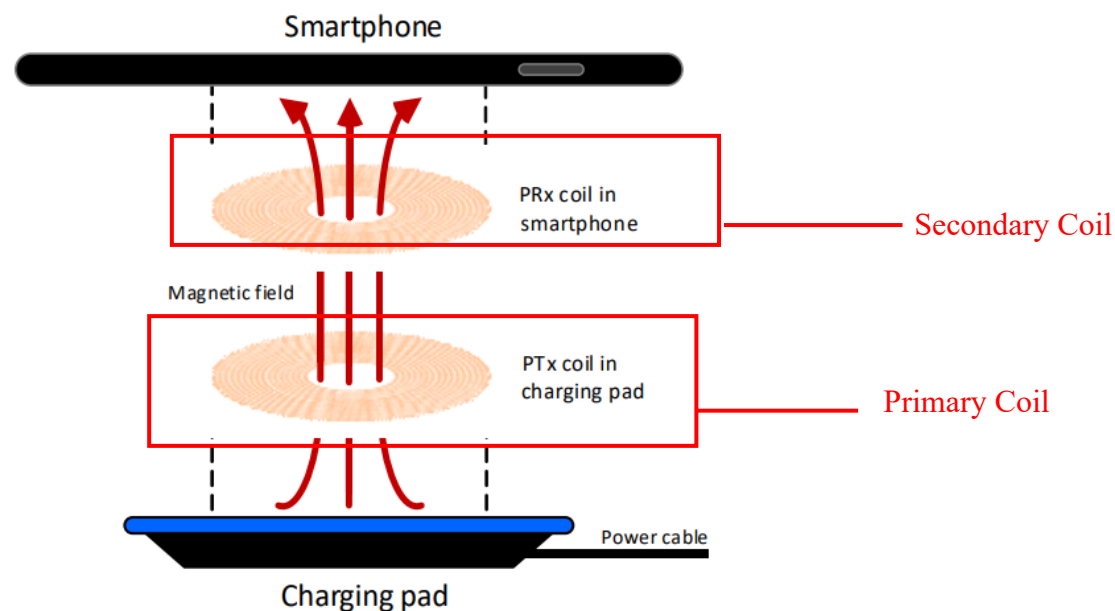
<p>[1.5] wherein the donor wireless power transfer mechanism includes a primary coil and donor circuit elements and the receptor wireless power transfer mechanism includes a secondary coil, receptor circuit elements and a capacitor such that the donor circuit elements provide electric current to the primary coil producing a magnetic field that</p>	<p>Company performs and/or induces others to perform a method of transferring power, wherein the donor wireless power transfer mechanism includes a primary coil and donor circuit elements and the receptor wireless power transfer mechanism includes a secondary coil, receptor circuit elements and a capacitor such that the donor circuit elements provide electric current to the primary coil producing a magnetic field that generates an electric current in the secondary coil and the receptor circuit elements thereby transferring power from donor mobile device to the receptor mobile device, the capacitor storing electric charge that increases battery life when the capacitor is discharged.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when charging begins, the power transmitter in BoostCharge Pro runs an alternating electrical current through its coil (“primary coil”), which generates an alternating magnetic field. This magnetic field is in turn picked up by the coil (“secondary coil”) inside the power receiver in the Qi-2 enabled smartphones and transformed by a power converter back into a direct electrical current that can be used to charge the battery of the Qi-2 enabled smartphones. Further, the power receiver circuitry in Qi-2 enabled smartphones comprises a secondary coil and a capacitor such that the battery gets charged. Further, the power receiver in Qi-2 enabled smartphones sends a signal to the power transmitter in BoostCharge Pro when wireless power is not required. It would be apparent to a person having ordinary skill in the art that the capacitor in the circuitry of Qi-2 enabled smartphones is used for storing an electric charge which further increases the battery life.</p>
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generates an electric current in the secondary coil and the receptor circuit elements thereby transferring power from donor mobile device to the receptor mobile device, the capacitor storing electric charge that increases battery life when the capacitor is discharged.

When charging begins, the Power Transmitter runs an alternating electrical current through its coil(s), which generates an alternating magnetic field in accordance with Faraday's law. This magnetic field is in turn picked up by the coil inside the Power Receiver and transformed by a power converter back into a direct electrical current that can be used to charge the battery.

A critical feature of the magnetic field is that it can transfer through any non-metallic, non-ferrous materials, such as plastics, glass, water, wood, and air. In other words, wires and connectors are not needed between the Power Transmitter Product and Power Receiver Product.

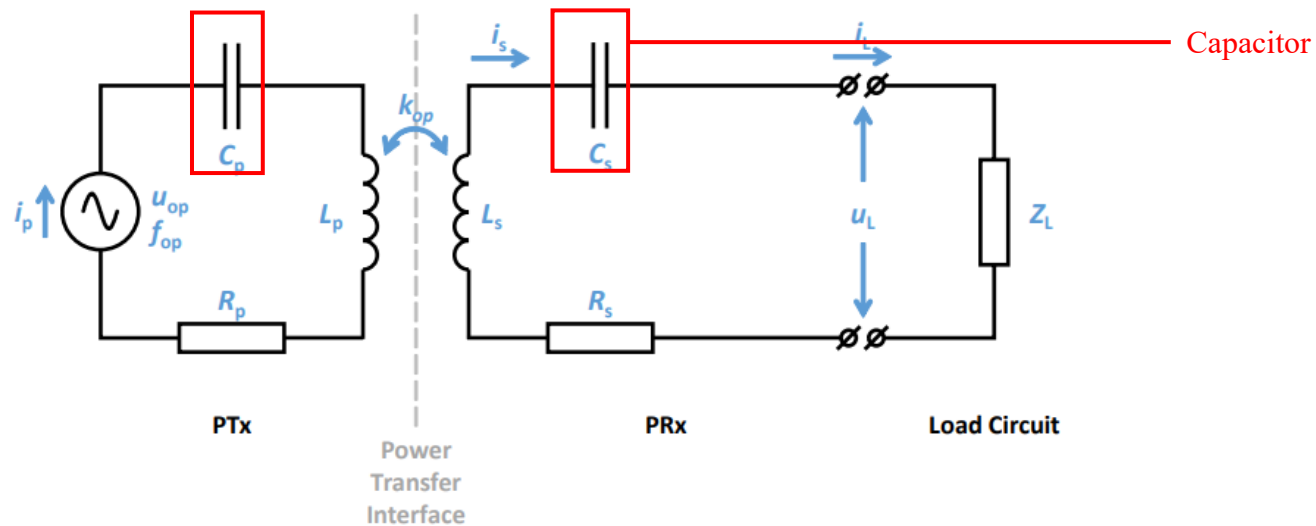
Figure 3. Qi wireless power transfer using magnetic induction



Source: <https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip> (Qi-v2.0-introduction.pdf, Page 2)

Figure 11 illustrates a simplified model of the system comprising a Power Transmitter on the left and a Power Receiver on the right. For clarity, the load circuit is drawn separately from the Power Receiver. The Power Transmitter consists of a power source (u_{op}, f_{op}), a capacitance C_p , an inductance L_p , and a resistance R_p . The power source supplies a sinusoidal voltage u_{op} at a frequency f_{op} . The Power Receiver consists of a capacitance C_s , an inductance L_s , and a resistance R_s . A load having an impedance Z_L is connected to the output terminals of the Power Receiver. The symbols u_L , i_L , i_p , and k_{op} represent the load voltage, load current, Primary Coil current, and coupling factor.

Figure 11. Simplified system model



Source: <https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip> (Qi-v2.0-power-delivery.pdf, Page 31)

It is recommended that the Power Transmitter Product's power consumption in stand-by mode of operation meets the Energy Star EPS Requirements for "Energy consumption for No-Load" and the European Commission, Code of Conduct of Energy Efficiency of External Power Supplies for "No-load power consumption." It is also recommended that a Power Receiver is designed in a manner that when wireless power is not required, the Power Receiver will send an End Power Transfer Packet to put the Power Transmitter Product in stand-by mode.

Source: <https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip> (Qi-v2.0-power-delivery.pdf, Page 43)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

2. List of References

1. <https://www.belkin.com/products/wireless-chargers/wireless-charging-stands/>, last accessed on 13 November, 2024.
2. <https://www.belkin.com/p/magnetic-power-bank-with-qi2-15w-8k/BPD007btWH.html>, last accessed on 13 November, 2024.
3. <https://www.wirelesspowerconsortium.com/standards/qi-wireless-charging/>, last accessed on 13 November, 2024.
4. <https://www.wirelesspowerconsortium.com/media/w0ha5cbk/qi2-certification-rolls-out-news-release-11132023.pdf>, last accessed on 13 November, 2024.
5. <https://www.wirelesspowerconsortium.com/media/52oflpuk/qi-v20-public.zip>, last accessed on 13 November, 2024.